

EXHIBIT E

From: [Chris Kachouroff](#)
To: [Loftus, Julie](#)
Cc: [Bedell, James](#); [Frey, Timothy](#)
Subject: Re: Smartmatic/ Lindell - Needed Expert Disclosures and Misc. Discovery
Date: Saturday, June 29, 2024 12:46:41 AM
Attachments: [image.png](#)
[2024.06.29 Defendants' Amended Notice of 30b6 Deposition of All Plaintiffs.pdf](#)

Julie,

1. I will have Bowse R.26 shortly.
2. I have searched high and low. Are you sure you have the right BATES? What expert report was it in?
3. Regarding Hayes, I already have depositions scheduled for 22, 23, 25, 26, 29, 30, and 31 July. Week of Aug 5 is wide open.

Finally, please advise when you will have your clients' 30b6 designee available. The amended notice is attached.


Chris

On Fri, Jun 28, 2024 at 10:40 AM Loftus, Julie <JLoftus@beneschlaw.com> wrote:

We are requesting R. 26(a)(2) disclosures for Mr. Bowse.

We do not yet know whether we will depose Mr. Hayes in person or remotely. We will let you know as soon as possible. No matter what, we can arrange for a remote setup for Defendants if you prefer.

Julie

 Julie Loftus
(she/her/hers)
Managing Associate | Litigation
Benesch Friedlander Coplan & Aronoff LLP
t: 312.624.6341 | JLoftus@beneschlaw.com
www.beneschlaw.com
71 South Wacker Drive, Suite 1600, Chicago, IL 60606-4637
Confidentiality Notice to Incorrect Addressee: www.beneschlaw.com/confidentialitynotice

From: Chris Kachouroff <chris@mck-lawyers.com>
Sent: Friday, June 28, 2024 9:36 AM
To: Loftus, Julie <JLoftus@beneschlaw.com>
Cc: Bedell, James <JBedell@beneschlaw.com>; Frey, Timothy <TFrey@beneschlaw.com>
Subject: Re: Smartmatic/ Lindell - Needed Expert Disclosures and Misc. Discovery

Julie,

Which expert? Gorowski?

Also where is Hayes? Remote or in CA?

CK

On Fri, Jun 28, 2024 at 10:33 AM Loftus, Julie <JLoftus@beneschlaw.com> wrote:

Chris,

I write regarding a few items.

First, we saw that you filed the motion to substitute a new expert to adopt Mr. Goroswky's report. Now that that motion is on file, we need the following disclosures for the new expert pursuant to Rule 26(a)(2). Specifically, we need the following information pursuant to these Rule sub-parts:

- (iv) the witness's qualifications, including a list of all publications authored in the previous 10 years;
- (v) a list of all other cases in which, during the previous 4 years, the witness testified as an expert at trial or by deposition; and
- (vi) a statement of the compensation to be paid for the study and testimony in the case.

Second, I am following up on my 6/20/2024 and 6/26/2024 emails requesting DEF11325173 (MyPillow's P&L statements from 2018 through 2022) and DEF1132574 (MyPillow's sales by retailer for 2022). These are documents cited by Defendant's expert that have not be produced to Smartmatic. Please produce them.

Third, please advise as to your availability the week of July 22–26 for the deposition of Conan Hayes.

Best,

Julie



Julie Loftus
(she/her/hers)
Managing Associate | Litigation
Benesch Friedlander Coplan & Aronoff LLP
t: [312.624.6341](tel:312.624.6341) | JLoftus@beneschlaw.com
www.beneschlaw.com
71 South Wacker Drive, Suite 1600, Chicago, IL 60606-4637

[Confidentiality Notice to Incorrect Addressee: www.beneschlaw.com/confidentialitynotice](http://www.beneschlaw.com/confidentialitynotice)

--

CHRISTOPHER I. KACHOUROFF, ESQ.

Tel: 703.621.3300

Cell: 703.853.0160

Web: www.mck-lawyers.com

Inline image 1



--

CHRISTOPHER I. KACHOUROFF, ESQ.

Tel: 703.621.3300

Cell: 703.853.0160

Web: www.mck-lawyers.com

Inline image 1

